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**UNITED STATE BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In the Matter of:	)	Bk 09-27796lbr
	)	Chapter 07
ELENA and DENNIS WOODWARD,	)	
Debtors.	)	Date:
	)	Time:

**EX PARTE MOTION TO REOPEN BANKRUPTCY CASE**

COME NOW, debtors, ELENA and DENNIS WOODWARD, by and through their attorney, **DANI L. STEPHENS, ESQ.**, to move this Honorable Court for a motion to reopen their bankruptcy chapter 7 filed on September 23rd, 2009 and discharged on March 4th, 2010 pursuant to Title 11 350(b) and Rule 5010.

... Debtors respectfully request to reopen their chapter 7 bankruptcy long enough to submit the reaffirmation for their 2007 Ford Mustang which inadvertently did not get submitted prior to the discharge. Consequently, despite the fact that the debtors continued to make the payments which were accepted without any heads up notice from either the Ford Motor Company or their attorney Jeffrey Sloane the vehicle was repossessed and sits in impoundment waiting to be

1 Bk 09-277961br

2 sent to Los Angeles for sale according to information gleaned to  
3 date.

4 3. The attorney for the debtors did not realize prior to  
5 discharge that all necessary acts and reaffirmations had not been  
6 tended to since the reaffirmation which had been faxed from Ford,  
7 -not mailed, - went unnoticed in the computer where all faxes go.

8 4. Debtors have been greatly disadvantaged by the unexpected  
9 repossession which left currently unemployed Debtor Elena, without  
10 transportation to search for work.

11 5. Due to exigent circumstances (expense of keeping vehicle  
12 in "storage") Debtors ask the Court to waive any need to wait for an  
13 opposition to this Motion on the grounds that this motion does not  
14 ask anyone to do anything they wouldn't have done if reaffirmation  
15 had been timely prior to discharge, therefor this motion does not  
16 interfere with anyones rights nor ask anyone to do anything they  
17 haven't already done.

18 **WHEREFORE**, Debtors respectfully pray for judgment as follows:

19 1. For the Courts to permit their Chapter 7 bankruptcy be  
20 reopened;

21 2. For Courts to permit the Reaffirmation for the Ford  
22 Mustang to be submitted;

23 3. For the Court to Order that the 2007 Ford Mustang be  
24 released to the Debtors immediately upon Debtors settling whatever  
25 reasonable debt may be owed to the entity in which the vehicle has  
26 been stored.

27 4. For the Court to waive the necessity of a response -thus

28 ...

1 exparte- since no one is being prejudiced by the temporary reopening  
2 of this bankruptcy.

3 5. For such other and further relief as the Court deems just  
4 and proper in the premises.

5 DATED, this 17th day of March, 2010.

6 Respectfully Submitted by:

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DANI L. STEPHENS, ESQ.

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Attorney for Debtors,  
ELENA and DENNIS WOODWARD  
Bk 09-27796lbr

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12 **UNITED STATE BANKRUPTCY COURT**

13 **DISTRICT OF NEVADA**

14 In the Matter of: ) Bk 09-27796lbr  
15 ) Chapter 07

16 ELENA and DENNIS WOODWARD,  
17 Debtors. ) Date:  
18 ) Time:

19 **EXPARTE ORDER**

20 **DEBTORS' EXPARTE MOTION TO REOPEN** their Bankruptcy 7 was filed  
21 on the above date and time; **DANI L. STEPHENS, ESQ.**, attorney for  
22 the Debtors submitted the Exparte Motion on behalf of Debtors, and  
23 the Court finding that exigent circumstances provide good Cause to  
24 Reopen immediately

25 **THE COURT HEREBY ORDERS** that Debtors' Chapter 7 referenced  
26 herein above shall be reopened immediately without need for a  
27 hearing to give Debtors opportunity to submit the Reaffirmation  
28 forthwith; and

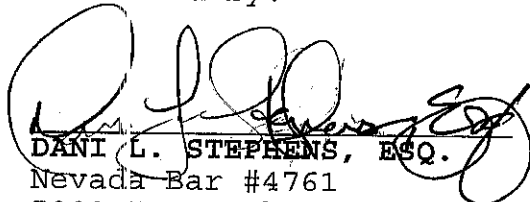
**IT IS FURTHER ORDERED** that the 2007 Ford Mustang be released to  
...

1 the Debtors immediately upon payment of storage fees owed to the  
2 entity in which the vehicle has been stored.

3 DATED and done on this 17 day of March, 2010.  
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6

7 THE HONORABLE JUDGE REIGEL, U.S. BANKRUPTCY JUDGE

8 Submitted by:

9   
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27 WOODWARD; CHAPTER 7, BK-S-09-277961br  
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